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February 26, 2010

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual Certification of TDS Telecommunications Corporation

Dear Ms. Dortch:

TDS Telecommunications Corporation, by its attorneys and on behalf of the wholly-owned subsidiaries identified in this submission (collectively, "TDS"), hereby files its annual CPNI certification pursuant to the requirements of Section 64.2009(e) of the Commission's rules.

This submission has been redacted for public inspection, as permitted by the *Report and Order* released by the Commission in the above-referenced docket on April 2, 2007. *See In re Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, 22 FCC Rcd 6927, 6954, n.167 (2007). A confidential, unredacted version of this submission will be filed today by hand.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,



Yaron Dori
Matthew S. DelNero
Counsel for TDS

cc: Best Copy and Printing, Inc. (via electronic mail)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2009 Calendar Year
EB Docket No. 06-36

Companies covered by this certification: Wholly owned telecommunications subsidiaries of TDS Telecommunications Corporation as of December 31, 2009.

Form 499 Filer IDs: Please see the attached list

Signatory Name: James W. Butman

Signatory Title: Group President of Sales, Marketing and Customer Operations, TDS Telecommunications Corporation

I, James W. Butman, certify that I am an officer of TDS Telecommunications Corporation, and acting as an agent of the company, that I have personal knowledge that the wholly owned telecommunication subsidiaries (Companies) have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

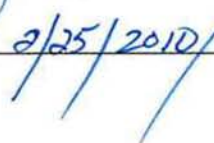
Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company did not receive any customer complaints for the 2009 calendar year concerning the unauthorized release of CPNI.

Signed: _____

Date Signed: _____

TDS Telecommunications Corporation (“TDS” or “Company”) takes seriously its duty to protect customer privacy. TDS complies with Section 222 of the Communications Act of 1934 and all of the FCC’s CPNI rules as described below.

On November 30, 2009, TDS acquired Union Telephone Company (“Union”).¹ TDS is in the process of integrating Union’s records, policies, personnel, and practices into the TDS family of companies. When fully integrated, TDS processes will supersede Union’s processes. Until that time, the former Union personnel continue to follow pre-acquisition processes and use pre-acquisition systems. The first section of this statement explains how the TDS companies, prior to November 30, 2009, ensure CPNI compliance through its procedures, processes, and systems. The second section of this statement explains how the newest TDS company, Union, ensures CPNI compliance through its procedures, processes, and systems.

I. TDS Companies (Excluding Union Telephone Co.)

A. Marketing Use of CPNI Information

Consistent with the FCC’s rules, TDS uses CPNI to market service offerings to our customers that are within the category of service to which the customer already subscribes (“Total Service Approach”), or to market services formerly known as adjunct-to-basic services, such as speed dialing, call blocking, call return, repeat dialing, call waiting, caller ID, and call forwarding. In those instances where TDS seeks to use CPNI outside of the Total Service Approach, TDS follows FCC rules, including the notice requirements in Section 64.2008(f) specific to One-Time use of CPNI.

TDS uses the Opt-Out approach in accordance with the FCC’s rules. TDS accesses and uses a customer’s CPNI to market our own (or our affiliates’) communication-related services (outside a customer’s current relationship) but only after the customer’s Opt-Out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. Every two years, TDS provides notice of customers’ rights to restrict use and disclosure of, and access to, their CPNI in compliance with FCC Rule 64.2008 and solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008, to each customer who has given Opt-Out consent.

TDS has a supervisory review process for sales and marketing campaigns using CPNI. A manager trained in the CPNI marketing rules reviews requests for marketing lists. If the requested marketing list is permitted under the CPNI rules, it is created and retained for a minimum of one year. If the requested list is not permitted under the CPNI rules, the request is denied.

B. Training and Education

TDS has specific training material that instructs its personnel as to when they are, and are not, authorized to use or disclose CPNI. The training addresses authentication, notification, and the breach monitoring process.

C. Passwords, Notification, and Breach Monitoring

¹ The transaction was approved by the FCC in September 2009. (Public Notice DA 09-2047, WC Docket No. 09-145, Released September 14, 2009.)

TDS has systems and processes in place to protect against, monitor for, and investigate possible CPNI breaches.

Passwords: TDS password systems are Personal Identification Number (“PIN”) based.

[REDACTED]

In addition, TDS has additional security functionality [REDACTED]

[REDACTED]

Assigning Passwords: 47 C.F.R. §64.2010(e) prohibits carriers from using readily available account or biographical information to establish a password on an existing account. To assist customers to establish passwords and comply with this requirement, TDS uses an application to assign random passwords. [REDACTED]

[REDACTED]

On-Line Access to CPNI: TDS customers have the ability to enroll in TDS ePay, the Company’s on-line bill payment and presentation application. The system prevents customers from using readily available account or biographical information in their passwords.

47 C.F.R. §64.2010(c) requires carriers to authenticate customers before allowing them online access to CPNI. That provision also prohibits carriers from authenticating customers using readily available biographical or account information. A new application was created to comply with this provision. [REDACTED]

[REDACTED]

After the ePay system verifies a customer’s identity, the customer then establishes an ePay password.

Notification of Account Changes: TDS notifies customers whenever a password, on-line account, or address of record is created or changed on an existing account. [REDACTED]

[REDACTED]

Databases date stamp e-mail and billing addresses. Those date stamps are used to ensure that notifications are not sent to the new address. Customer service representatives also use this information to ensure that they send protected information to the customer at their address of record.

As required by 47 C.F.R. § 64.2010(f), notifications do not reveal the changed information.

Breach Monitoring: TDS has an escalation process to investigate and, if appropriate, report unauthorized release of customer account information. Any employee may initiate an investigation and any such investigation is documented. Disciplinary action, up to and including termination, may result if an employee discloses protected information to unauthorized parties.

[REDACTED]

[REDACTED]

D. Policy & Process

Under written TDS policy, [REDACTED]

[REDACTED]

Violating TDS policies can result in disciplinary action, up to and including termination.

Company policies are communicated in writing to all employees when they join TDS and on an annual basis thereafter. Every employee must acknowledge that he or she has read and understood the policies.

TDS has numerous operational processes regarding how customer service representatives assist callers. Those processes are designed to comply with the password authentication requirements contained in § 64.2010 of the FCC's rules. Customer identity is verified prior to disclosing CPNI when receiving an in-bound call or assisting customers at a business office.

- Customer service representatives receiving in-bound calls attempt to authenticate all callers using their password.
- Where passwords do not exist on the account or cannot be remembered, the TDS customer service representative will not discuss password protected information, unless the representative can return the customer's call by contacting the customer at his or her telephone number of record.
- Either passwords or valid photo identification is used to verify customer identity at business offices.

II. Union Telephone Company

A. Marketing Use of CPNI Information

The processes associated with the marketing use of CPNI information does not significantly vary in comparison with the TDS processes described in Section I.

Union adopted a policy of providing written CPNI notices to all customers every two years. Those notices explain the customers' rights as required by FCC rule. Union uses customer CPNI to market communication-related services outside a customer's current relationship only after the customer's consent has been obtained.

Union has a supervisory review process to ensure marketing campaigns using CPNI are managed in accordance with FCC rules. This process includes managerial review and approval of any proposed marketing request utilizing CPNI. If the marketing campaign is permitted under the CPNI rules, it is created, used and records of that campaign are retained for a minimum of one year.

B. Training and Education

Union trains and educates its employees on the appropriate use of CPNI and CPNI related procedures. That training occurs at the point of hire. In addition, CPNI procedures are reviewed with business office personnel twice a year.

C. Passwords, Notification, and Breach Monitoring

Union, like TDS, has systems in place to protect against, monitor for, and investigate possible CPNI breaches. Customers are asked to establish a password that does not use readily available biographical information or account information. When passwords or addresses of record are created or changed on existing accounts, notice of the change is completed as required by FCC rule.

[REDACTED] As required by 47 C.F.R. § 64.2010(f), notifications do not reveal the changed information.

Union customers do not have an on-line access to account information.

D. Policy & Process

Union policies and processes are designed to protect to protect CPNI. For example, Union employees are required to sign a confidentiality agreement when hired. That confidentiality agreement requires that they maintain the confidentiality of all information including customer information obtained as a result of their employment. If employees violate the confidentiality agreement or otherwise permit the unauthorized use or disclosure of CPNI, they are subject to discipline and termination.

Union, like TDS, has numerous operational processes regarding how customer service representatives assist callers. Those processes do not significantly vary in comparison with the TDS processes described in Section I.

State	TDS Entity	499 Filer ID	State	TDS Entity	499 Filer ID
AL	Butler Telephone Company	806589	ME	West Penobscot Telephone Company	806784
AL	Oakman Telephone Company	806580	MI	Chatham Telephone Company	806523
AL	Peoples Telephone Company	806631	MI	Communications Corp. of Michigan	806526
AR	Cleveland County Telephone Co.	805440	MI	Island Telephone Company	806529
AR	Decatur Telephone Company	805443	MI	Shiawassee Telephone Company	806532
AZ	Arizona Telephone Company	805434	MI	Wolverine Telephone Company	806535
AZ	Southwestern Telephone Company	805377	MN	Arvig Telephone Company	806766
CA	Happy Valley Telephone Company	805449	MN	Bridge Water Telephone Company	804465
CA	Hornitos Telephone Company	805455	MN	KMP Telephone Company	805585
CA	Winterhaven Telephone Company	805485	MN	Mid-State Telephone Company	805585
CO	Delta County Tele-Comm, Inc.	805446	MN	Winsted Telephone Company	806409
CO	Strasburg Telephone Company	805479	MO	New London Telephone Company	805464
FL	Quincy Telephone Company – FL	806583	MO	Orchard Farm Telephone Company	805470
GA	Blue Ridge Telephone Company	806634	MO	Stoutland Telephone Company	805476
GA	Camden Telephone & Telegraph Co. – GA	806823	MS	Calhoun City Telephone Company	806637
GA	Nelson-Ball Ground Telephone Co.	802134	MS	Myrtle Telephone Company	805866
GA	Quincy Telephone Company – GA	806583	MS	Southeast Mississippi Tel	806577
ID	Potlatch Telephone Company	805473	NC	Barnardsville Telephone Company	806562
IN	Camden Telephone Company – IN	802068	NC	Saluda Mountain Telephone Co.	806616
IN	Communications Corp. of Indiana	806559	NC	Service Telephone Company	806601
IN	Comm. Corp. of Southern Indiana	806556	NH	Contoocook Valley Telephone Co.	808275
IN	Home Telco of Pittsboro	806550	NH	Hollis Telephone Company	809570
IN	Home Telephone Co. – Waldron	806553	NH	Kearsarge Telephone Company	806796
IN	Merchants & Farmers Telephone Co.	809001	NH	Merrimack County Telephone Co.	808275
IN	S & W Telephone Company, Inc.	801558	NH	Wilton Telephone Company	809034
IN	Tipton Telephone Company	804819	NY	Deposit Telephone Company	801840
IN	Tri-County Telephone Company	801264	NY	Edwards Telephone Company, Inc.	806781
IN	West Point Telephone Company, Inc.	809790	NY	Oriskany Falls Telephone Company	806814
KY	Leslie County Telephone Company	806619	NY	Port Byron Telephone Company	806817
KY	Lewisport Telephone Company	806625	NY	Township Telephone Company, Inc.	808425
KY	Salem Telephone Company	806622	NY	Vernon Telephone Company	809218
ME	Cobbosseecontee Telephone Co.	801201	OH	Arcadia Telephone Company	806544
ME	Hampden Telephone Company	803232	OH	Continental Telephone Company	806541
ME	Hartland & St. Albans Telephone	806802	OH	Little Miami Communications Corp.	806547
ME	Somerset Telephone Company	806799	OH	Oakwood Telephone Company	806538
ME	The Island Telephone Company	806820	OH	Vanlue Telephone Company	808419
ME	Warren Telephone Company	806787	OK	Mid-America Telephone Company	805461

State	TDS Entity	499 Filer ID	State	TDS Entity	499 Filer ID
OK	Oklahoma Communication Systems	805467	WI	Black Earth Telephone Company	805560
OK	Wyandotte Telephone Company	805488	WI	Bonduel Telephone Company	805566
OR	Asotin Telephone Company – OR	805437	WI	Central State Telephone Company	805572
OR	Home Telephone Company – OR	805452	WI	Dickeyville Telephone Company	807810
PA	Mahoney & Mahantango Tel. Co.	806808	WI	Eastcoast Telecom, Inc.	805575
PA	Sugar Valley Telephone Company	806775	WI	Farmers Telephone Company	807813
SC	McClellanville Telephone Company	806586	WI	Grantland Telephone Company	805578
SC	Norway Telephone Company	806574	WI	Mid-Plains Telephone Company	806862
SC	St. Stephen Telephone Company	806592	WI	Midway Telephone Company	805581
SC	Williston Telephone Company	806598	WI	Mosinee Telephone Company	808410
TN	Concord Telephone Exchange Inc.	806604	WI	Mt. Vernon Telephone Company	805584
TN	Humphreys County Telephone Co.	806565	WI	Riverside Telecom, Inc.	805587
TN	Tellico Telephone Company	806613	WI	Scandinavia Telephone Company	805590
TN	Tennessee Telephone Company	806610	WI	Southeast Telephone Company	808374
VA	Amelia Telephone Company	806607	WI	State Long Distance Telephone Co.	801561
VA	New Castle Telephone Company	806628	WI	Stockbridge & Sherwood Telephone	805593
VA	Virginia Telephone Company	806568	WI	Tenney Telephone Company	805596
VT	Ludlow Telephone Company	806805	WI	Utelco, Inc.	801945
VT	Northfield Telephone Company	806793	WI	Union Telephone Company	801576
VT	Perkinsville Telephone Company	806790		Waunakee Telephone Company	805602
WA	Asotin Telephone Company – WA	805437			
WA	Lewis River Telephone Company	807207	CLEC	TDS Metrocom, LLC	817212
WA	McDaniel Telephone Company	804768	CLEC	US Link, Inc.	809008
WI	B. B. & W. Telephone Company	805569			
WI	Badger Telecom, Inc.	805563		TDS Long Distance Corporation	820658